

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: CASE NO 19-70024-JAD

Richard E Hanes, and Kelly L Hanes, Chapter 13
Debtor(s).

Ronda J. Winnecour, Chapter 13
Trustee,
Movant(s),

vs.
Richard E Hanes, and Kelly L Hanes,
Respondent(s).

CONSENT ORDER OF COURT DISPOSING OF LUMP SUM PAYMENT AND
COMPLETING THE PLAN

WHEREAS, the Trustee has posted an insurance proceeds check in the amount of \$16,650.48 on account of the Debtor(s) 2015 Jeep Renegade having been declared a total loss (the "Lump Sum");

WHEREAS, all secured and priority debt to have been paid in the Plan has been paid in full; the only remaining secured debt is long term continuing debt;

WHEREAS, the total pool of timely filed general unsecured creditors is \$3,815.13;

WHEREAS, the Debtor(s) and Trustee agree to use the Lump Sum to effect an early completion of the plan on the following terms and conditions:

- (1) Trustee shall refund \$11,650.48 of the Lump Sum to the Debtor(s) at the first distribution after the requisite hold period for the payment has passed.
- (2) The remaining \$5,000 (together with such other balance on hand as the Trustee shall have) shall, after deduction of Trustee fees, be used to pay:
 - (a) the balance due Debtor(s) attorney on account of his allowed fees (in the remaining amount of \$575);
 - (b) timely filed general unsecured creditors

100%; and (c) the amount need to bring US. Bank Trust (CI #5) current through February 2022, which includes implementing all filed and allowed payment change notices of record.

- (3) Debtor(s) shall resume long term continuing debt payment(s) beginning March, 2022.
- (4) Plan completion is subject to final audit. To the extent the funds retained are insufficient to fund what is need to complete the case at 100% the Debtor(s) shall pay in the shortfall. To the extent of any surplus, it shall be refunded.

So Ordered this _____ day of _____, 20_____.

U. S. Bankruptcy Judge

Consented to:

/s/ Owen W. Katz
Owen W. Katz
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
Email: okatz@chapter13trusteewdpa.com
Attorney for Chapter 13 Trustee

/s/ Terry L. Graffius
Terry L. Graffius
Leventry & Haschak, LLC
1397 Eisenhower Blvd.
Richland Square III Suite 202
Johnstown, PA 15904
Contact phone 814-266-1799
Email: tgraffius@lhrklaw.com
Attorney for Debtor(s)